

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

RECEIVED

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SUPER 8 MOTELS, INC.

Plaintiff,

V.

2:06 CV 206-DRB

**JALA INVESTMENTS, INC.,  
HIMAT, INC., CHANDRAKANT  
PATEL, and DHIRAJLAL PATEL**

Defendants.

**ANSWER**

COMES NOW, the defendant, JALA Investments, Inc., in the above-styled cause and for answer to the plaintiff's complaint states as follows:

## FIRST DEFENSE

This defendant pleads not guilty.

## SECOND DEFENSE

This defendant pleads that venue is improper.

### THIRD DEFENSE

This defendant pleads that service is improper.

### **FOURTH DEFENSE**

This defendant denies each and every material allegation and demands strict proof thereof.

## **FIFTH DEFENSE**

This defendant pleads the affirmative defense of contributory negligence.

**SIXTH DEFENSE**

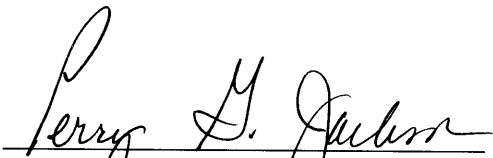
This defendant denies that the plaintiff is injured to the extent as alleged in the complaint and demands strict proof thereof.

**EIGHTH DEFENSE**

This defendant states that this matter is due to be dismissed as the complaint was filed outside of the applicable statute of limitations.

**NINTH DEFENSE**

This defendant specifically reserves the right to amend its answer as future discovery may dictate.

  
Perry G. Jackson, Attorney for  
Defendant JALA Investments, Inc.  
Attorney Bar Code: JAC070

**Of Counsel:**

Perry G. Jackson  
2229 Morris Avenue  
Birmingham, AL 35203  
205-323-6170  
Fax 205-278-3430  
[perrygjackson@hotmail.com](mailto:perrygjackson@hotmail.com)

**CERTIFICATE OF SERVICE**

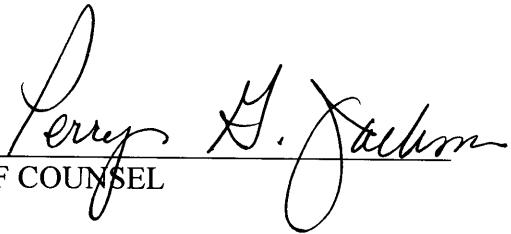
I hereby certify that I have this the 27th day of March, 2006, served a copy of the foregoing to all attorneys of record by placing of copy of same in the United States Mail, postage prepaid and properly addressed as follows:

Robin G. Laurie, Esq.  
Balch & Bingham, LLP  
Post Office Box 78  
Montgomery, AL 36101

Jayram Patel  
Himat, Inc.  
2314 South Broad Avenue  
Lanett, AL 36863

Chandrakant Patel  
3530 North Henry Boulevard  
Stockbridge, GA 30281

Dhirajlal Patel  
3530 North Henry Boulevard  
Stockbridge, GA 30281

  
OF COUNSEL